

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 vs. ) Case No.: 4:17-cr-578-CDP (SPM)  
 )  
 WILLIAM GUM, )  
 )  
 Defendant. )

**FRIST MOTION TO EXTEND THE TIME TO FILE DEFENDANT'S OBECTIONS TO  
THE PRESENTENCE INVESTIGATION REPORT AND FIRST MOTION TO  
CONTINUE SENTENCING**

COMES NOW Defendant, William Gum, by and through counsel, moves this Court to extend the time to file objections to the presentence investigation report by 14 days and to continue the sentencing set for January 28, 2019 for 30 days. In support of this motion, Defendant states as follows.

1. Defendant and the probation office continue to work together to ensure the financial component of the PSR contains an accurate account of all information, including information received as recently as last week.
2. To this end, Defendant and the probation officer assigned to Defendant's case met today and may need to meet again to complete the PSR.
3. In addition, the PSR lists a restitution amount at odds with the parties' agreement and existing court of appeals precedent.
4. The probation office has not had time to discuss this matter with the parties and does not expect it will do so before the end of current week.

5. Defendant suspects a discussion among the parties and the probation office will obviate the need to file an objection to the restitution amount as currently calculated in the PSR.
6. Similarly, the PSR attributes losses to Defendant based on an audit which itself does not claim that Defendant caused all losses it lists.
7. In good faith, Defendant believes additional time to discuss this matter with the government and the probation office may obviate the need to file an objection to the loss amount as currently calculated.

WHEREFORE, Defendant respectfully requests this Court extend the time to file objections to the presentence investigation report by 14 days and continue the sentencing set for January 28, 2019 for 30 days

Respectfully submitted,

ROSENBLUM, SCHWARTZ & FRY, P.C.,

By: /s/ Adam D. Fein  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that on January 7, 2019, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Jeannette Graviss and Mr. Kyle T. Bateman, Assistant United States Attorneys.